

PUGET SOUND AIR POLLUTION CONTROL AGENCY
KING COUNTY ▲ KITSAP COUNTY ▲ PIERCE COUNTY ▲ SNOHOMISH COUNTY

October 16, 1998

Registration No. 11339

Mr. Henrik Voldbaek
Ash Grove Cement Co.
3801 E. Marginal Way S.
Seattle, Washington 98134

Dear Mr. Voldbaek:

Disposition of Notice of Violation No. 36560

This Agency considers the above-referenced matter closed and will take no further enforcement action in this case.

If you have any questions concerning this matter, please contact me at 689-4026.

Sincerely,

Elizabeth M. Gilpin
Inspector II

EMG:VID

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Margaret Pageler, City of Seattle, Board Chair
Janet Chalupnik, Member at Large
Edward D. Hansen, Mayor, Everett

Lynn S. Horton, Mayor, Bremerton
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Ron Sims, King County Executive

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Registration No. 11339
Cert. Mail No. 2334353365

No. **35793**

NOTICE OF VIOLATION

Date of Violation: August 5th 19 97 RECEIVED at OCT 20 1997 m.

Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>OCT 20 1997</u> <u>AGCW-SEATTLE</u> <u>Henrik Voldbaek</u> Manager		
Location of Violation (Address) <u>3801 E. Marginal Way So.</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>King</u>
Mailing Address <u>As Above</u>	City, State <u>Seattle, WA</u>	Zip <u>98134</u>	Phone <u>623-5596</u>

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. _____, Condition No. _____

☒ Section 12.02 (c) Unlawful to cause or allow the operation of any equipment which is required to use CEM through an order of approval without the continuous monitoring of the emissions in accordance with the requirements of Sections 12.03 and 12.04

FACTS ALLEGED TO CONSTITUTE A VIOLATION Causing or allowing the operation of the Cement Kiln which is required to use CEM through Order of Approval # 5730, dated 12/29/94 condition #8 while failing to continuously monitor SO₂, NO_x, and CO.

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

F. L. Austin

Issued By: F. L. Austin
Air Pollution Inspector
Form No. 70-119 (Revised 12/95 cbe)

10/17/97
Date/Time

Received By: _____
Signing this Notice is not an admission of guilt

AGCS2M000023

Registration No. 11339
Cert. Mail No. 2334353365

No. 35795

NOTICE OF VIOLATION

Date of Violation: 8-13, 19 77 RECEIVED at .m.

Name	Responsible Person, Title		
Ash Grove Cement Co.	OCT 20 1997 Henrik Voldhaug, Plant Mgr		
Location of Violation (Address)	City	Zip	County
3801 E. Marginal Way S	Seattle	98134	KING
Mailing Address	City, State	Zip	Phone
Same	, WA		623-5596

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- | | |
|------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/> Section 5.05(e) | Failure to develop and implement an operation and maintenance plan. |
| <input type="checkbox"/> Section 6.03(a) | Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source. |
| <input type="checkbox"/> Section 9.03(a) | Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour. |
| <input type="checkbox"/> Section 9.11(a) | Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property. |
| <input type="checkbox"/> Section 9.12(b) | Emission of odor-bearing air contaminants without use of best available control technology. |
| <input type="checkbox"/> Section 9.15(a) | Emission of fugitive dust without use of best available control technology. |
| <input type="checkbox"/> Section 9.15(b) | Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway. |
| <input type="checkbox"/> Section 9.15(c) | Emission of fugitive dust from manufacturing process equipment or control apparatus. |
| <input type="checkbox"/> Section 9.16 | Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack. |
| <input type="checkbox"/> Section 9.20 | Failure to operate and maintain equipment in good working order. |
| <input type="checkbox"/> | Failure to meet Order of Approval No. _____, Condition No. _____ |

☐ Failure to meet Order of Approval No. _____, Condition No. _____
☒ Section 12.02(c) Unlawful to cause or allow operation of any equipment required to use CEM per Order of Approval without continuously monitoring emissions
☐ Section per Reg I Sect 12.03 & 12.04

FACTS ALLEGED TO CONSTITUTE A VIOLATION *Operation of cement kiln without continuous monitoring SO₂, NO_x, & CO emissions as required per Order of Approval 5730 Condition 8 dated 12/29/94.*

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to **submit a written report within ten (10) days of receipt of this Notice** describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, **and** take the following necessary corrective action:

Frank L. Smith

Issued By: M. Mc Guff 10/17/97
Air Pollution Inspector Date/Time 5:22
Form No. 70-119 (Revised 12/95 cbo)

Received By: _____
Signing this Notice is not an admission of guilt



PUGET SOUND AIR POLLUTION CONTROL AGENCY
KING COUNTY KITSAP COUNTY PIERCE COUNTY SNOHOMISH COUNTY

PSAPCA Registration No. 11339

May 19, 1998

Mr. Henrik Voldbaek
Ash Grove Cement Co.
3801 E. Marginal Way S.
Seattle, Washington 98134

*Rec'd 5/26/98
[Signature]*

Dear Mr. Voldbaek:

**Disposition of Notice of Violation Nos. 35793 – 35796
36594 – 36596, 37067 – 37069, 37387 – 37395, 37399 – 37431, 36586 - 36587**

Based on the amended sections of Regulation I, Article 12, effective June 1, 1998, which change the valid hourly monitoring data recovery requirement from 90% during daily operations to 95% during each calendar month, the Agency considers the above-referenced matters closed and will take no further enforcement action in this matter.

If you have any questions concerning this matter, please contact me at 689-4078.

Sincerely,

James L. Nolan
Director - Compliance

EMG:VJD

Dennis J. McLerran, Air Pollution Control Officer
B O A R D O F D I R E C T O R S

Commissioner, Kitsap County
Member at Large
Mayor, Everett

Mayor, Bremerton
Snohomish County Council
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Mayor, Tacoma
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ASH GROVE CEMENT COMPANY



"WESTERN REGION"

May 5, 1998

Mr. Jim Nolan
Director, Compliance Division
Puget Sound Air Pollution Control Agency
110 Union Street, Suite 500
Seattle, WA. 98101

Re: CEM NOVs

Dear Mr. Nolan:

Several months ago you suggested that upon adoption of amendments to PSAPCA's CEM rules PSAPCA would consider dismissing all NOVs issued to Ash Grove for CEM downtime, provided that the incident described in the NOV would not violate the amended rule. As you know, Ash Grove does not believe that Regulation I prescribed a minimum data recovery requirement prior to the recent amendment of § 12.03, and Ash Grove questions the validity of all NOVs issued under the old rule. Nevertheless, we welcome the amended rule, and we are writing to show that none of the outstanding NOVs would have violated the current § 12.03.

The attached spreadsheet shows, for each month, the cumulative number of CEM downtime hours, and the percent of hours for which Ash Grove recovered valid data. It shows that during every month except July 1997 and December 1997 Ash Grove recovered valid data for more than 95 percent of total operating hours, the standard imposed by new § 12.03(b). In July 1997 Ash Grove performed annual maintenance on the monitors, reducing data recovery to 91 percent. The Monitor Downtime Report for July 1997 (copy enclosed) describes the work performed. Monitor downtime attributable to routine maintenance is exempt from the data recovery requirement under § 12.03(b)(2). There was no other CEM downtime during July 1997.¹

For three days in December 1997 the opacity monitor read 2 to 3 percent high, due to dust or dirt on the lens. Ash Grove reported this event as a three day exceedance of the 5 percent one hour opacity standard, and included in its December 1997 CEM Report (copy enclosed) a long explanation of what Ash Grove staff did to troubleshoot, first the baghouse, then the COM.

¹ Ash Grove's Downtime Report for July 1997 shows seven hours of maintenance downtime on July 24. The date should have been listed as July 25, the date for which PSAPCA issued three NOVs for inadequate data recovery. All NOVs for monitor downtime in July 1997 were issued for periods during which Ash Grove was performing routine maintenance work.

May 5, 1998

Page 2

PSAPCA issued three NOVs for violation of former § 12.02(a) (operation of a cement kiln without a COM) on December 1, 2 and 3. To this day Ash Grove does not know how the condition of the COM on December 1, 2 and 3 violated former § 12.02(a). It certainly would not violate the current § 12.03(b), unless PSAPCA concludes that Ash Grove's efforts to troubleshoot and repair the COM were not timely and responsive.

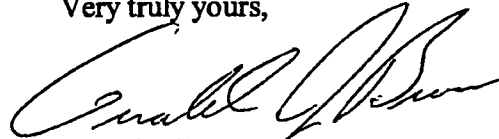
Several features of the spreadsheet require an explanation. First, we measured compliance separately for each monitor. In other words, we read the new § 12.03 as setting a minimum data recovery requirement for each monitor at a source, not a cumulative up-time requirement for all CEMs taken together. You will note, however, that every instance of CEM downtime affected all of our analyzers. That is because the monitors share a common sample line, and any repair work on one CEM requires shutdown of the sample line.

Second, during most months the hours of monitor downtime exceeded the number of hours for which PSAPCA issued NOVs. That is because PSAPCA inspectors issued NOVs only when monitor downtime during a day exceeded 10 percent of the operating hours during that day. Occasionally we lose data for one hour during a day. The data we used to measure compliance with the 95 percent data recovery requirement includes not only monitor downtime for which PSAPCA issued NOVs, but all monitor downtime recorded during that month.

In summary, Ash Grove met the data recovery requirements of the new § 12.03(b) during all months of 1997. To date, Ash Grove has reported no monitor downtime during 1998. Assuming that PSAPCA remains committed to dismissing those NOVs that would not violate the new rule, we request that PSAPCA withdraw all of the NOVs listed on the attached spreadsheet.

Please call me at 694-6221 if you have any questions about the attached spreadsheet, or the information in this letter.

Very truly yours,



Gerald J. Brown
Manager, Safety & Environment






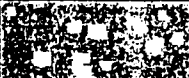
cc: Fred Austin





50037.01.SE
05/09/98 8:55 AM

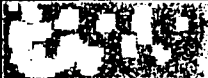
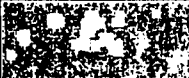






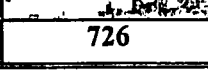
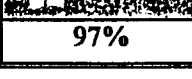
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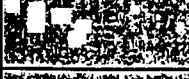

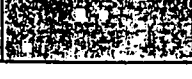
AGCS2M000027

ASH GROVE CEMENT CO.

Notes	CEM/ DATE REPORTED	MONITOR DOWN TIME -HRS.*	KILN OPERATING TIME - HRS	% TIME OPERATING MONITORED
	Dec. 3, 1997 - Opacity NOV # - 36596	0		
	Dec. 2, 1997 - Opacity NOV # - 36595	0		
	Dec. 1, 1997 - Opacity NOV # - 36594	0		
See A	December 1997 Total	0	604	100%

	Nov 12, 1997 SO2, NOx, CO NOV # - 36587	3		
	Nov 4, 1997 -SO2, NOx, CO NOV # - 36586	6		
	Misc. Hours during month	4		
	November 1997 Total	13	636	98%

	August 18, 1997 -SO2, NOx, CO NOV # - 35796	5		
	August 13, 1997 -SO2, NOx, CO NOV # - 35795	3		
	August 12, 1997- SO2, NOx, CO NOV # - 35794	5		
	August 5, 1997- SO2, NOx, CO NOV # - 35793	5		
	Misc. Hours during month	4		
	August 1997 Total	22	726	97%

	July 30, 1997 - SO2, NOx, CO NOV #s - 37429, 37430, 37431	6		
	July 28, 1997 - SO2, NOx, CO NOV #s - 37426, 37427, 37428	6		
	July 25, 1997 - SO2, NOx, CO NOV #s - 37423, 37424, 37425	7		
	July 23, 1997 - SO2, NOx, CO NOV #s - 37420, 37421, 37422	6		
	July 22, 1997 - SO2, NOx, CO NOV #s - 37417, 37418, 37419	7		

	July 21, 1997 - SO ₂ , NO _x , CO NOV #s - 37414, 37415, 37416	8		
	July 15, 1997 - SO ₂ , NO _x , CO NOV #s - 37411, 37412, 37413	6		
	July 14, 1997 - SO ₂ , NO _x , CO NOV #s - 37408, 37409, 37410	7		
	Misc. Hours during month	4		
See: B	July 1997 Total	57	659	91%

	June 25, 1997 - SO ₂ , NO _x , CO NOV #s - 37067, 37068, 37069	5		
	Misc. Hours during month	5		
	June 1997 Total	10	704	98.5%

	May 21, 1997 - SO ₂ , NO _x , CO NOV #s - 37405, 37406, 37407	3		
	May 12, 1997 - SO ₂ , NO _x , CO NOV #s - 37402, 37403, 37404	7		
	May 5, 1997 - SO ₂ , NO _x , CO NOV #s - 37399, 37400, 37401	5		
	Misc. Hours during month	7		
	May 1997 Total	22	668	97%

	April 8, 1997 - SO ₂ , NO _x , CO NOV #s - 37387, 37390, 37393	4		
	April 25, 1997 - SO ₂ , NO _x , CO NOV #s - 37388, 37391, 37394	3		
	April 30, 1997 - SO ₂ , NO _x , CO NOV #s - 36789, 37392, 37395	8		
	Misc. Hours during month	6		
	April 1997 Total	26	701	96%

* Time expressed is for each monitor shown.

A Opacity monitor operating but was reading 2-3% higher for 45 hours- Subject to 12.03 (f) (5). See Pg. 1-3 Revised Addendum to December 1997 report submitted 04/02/98.

B Monitor maintenance subject to 12.03 (b) (1). See Pg. 3 Addendum to CEM forms July 1997

ASH GROVE CEMENT CO.

Notes	CEM/ DATE REPORTED	MONITOR DOWN TIME -HRS.*	KILN OPERATING TIME - HRS	% TIME OPERATING MONITORED
	Dec. 3, 1997 - Opacity NOV # - 36596	0		
	Dec. 2, 1997 - Opacity NOV # - 36595	0		
	Dec. 1, 1997 - Opacity NOV # - 36594	0		
See A	December 1997 Total	0	604	100%
DISP:	All Closed 5/11 w/No Action			

	Nov 12, 1997 SO2, NOx, CO NOV # - 36587	3		
	Nov 4, 1997 -SO2, NOx, CO NOV # - 36586	6		
	Misc. Hours during month	4		
	November 1997 Total	13	636	98%
DISP:	All Closed 5/11 w/No Action			

	August 18, 1997 -SO2, NOx, CO NOV # - 35796	5		
	August 13, 1997 -SO2, NOx, CO NOV # - 35795	3		
	August 12, 1997- SO2, NOx, CO NOV # - 35794	5		
	August 5, 1997- SO2, NOx, CO NOV # - 35793	5		
	Misc. Hours during month	4		
	August 1997 Total	22	726	97%
DISP:	All Closed 5/11 w/No Action			

	July 30, 1997 - SO2, NOx, CO NOV #s - 37429, 37430, 37431	6		
	July 28, 1997 - SO2, NOx, CO NOV #s - 37426, 37427, 37428	6		
	July 25, 1997 - SO2, NOx, CO NOV #s - 37423, 37424, 37425	7		

	July 23, 1997 - SO2, NOx, CO NOV #s - 37420, 37421, 37422	6		
	July 22, 1997 - SO2, NOx, CO NOV #s - 37417, 37418, 37419	7		
	July 21, 1997 - SO2, NOx, CO NOV #s - 37414, 37415, 37416	8		
	July 15, 1997 - SO2, NOx, CO NOV #s - 37411, 37412, 37413	6		
	July 14, 1997 - SO2, NOx, CO NOV #s - 37408, 37409, 37410	7		
	Misc. Hours during month	4		
See: B	July 1997 Total	57	659	91%
DISP:	All Closed 5/11 w/No Action			

	June 25, 1997 - SO2, NOx, CO NOV #s - 37067, 37068, 37069	5		
	Misc. Hours during month	5		
	June 1997 Total	10	704	98.5%
DISP:	All Closed 5/11 w/No Action			

	May 21, 1997 - SO2, NOx, CO NOV #s - 37405, 37406, 37407	3		
	May 12, 1997 - SO2, NOx, CO NOV #s - 37402, 37403, 37404	7		
	May 5, 1997 - SO2, NOx, CO NOV #s - 37399, 37400, 37401	5		
	Misc. Hours during month	7		
	May 1997 Total	22	668	97%
DISP:	All Closed 5/11 w/No Action			

	April 8, 1997 - SO2, NOx, CO NOV #s - 37387, 37390, 37393	4		
	April 25, 1997 - SO2, NOx, CO NOV #s - 37388, 37391, 37394	3		
	April 30, 1997 - SO2, NOx, CO NOV #s - 36789, 37392, 37395	8		
	Misc. Hours during month	6		
	April 1997 Total	26	701	96%
DISP:	All Closed 5/11 w/No Action			

***** Time expressed is for each monitor shown.

A Opacity monitor operating but was reading 2-3% higher for 45 hours- Subject to 12.03 (f) (5). See Pg. 1-3 Revised Addendum to December 1997 report submitted 04/02/98.

B Monitor maintenance subject to 12.03 (b) (1). See Pg. 3 Addendum to CEM forms July 1997

**ADDENDUM TO CEM FORMS
DECEMBER 1997 (REVISED)
ASH GROVE CEMENT**

PRODUCTION/CONTROL DATA:

Kiln Operating Time*	578 hours
Average Production**	89.7 tons/hr
Emission Rate SO ₂	0.802 lb/ton
Emission Rate NO _x	2.121 lb/ton
Emission Rate CO	4.205 lb/ton

* Includes kiln preheat time.

** Does not include kiln preheat time

OPACITY:

<u>Date</u>	<u>Time</u>	<u>Hourly Value</u>	<u>Date</u>	<u>Time</u>	<u>Hourly Value</u>
12/01/97	14:00	6.47	12/02/97	13:00	5.47
12/01/97	15:00	6.56	12/02/97	14:00	5.97
12/01/97	16:00	7.37	12/02/97	15:00	5.96
12/01/97	17:00	6.41	12/02/97	16:00	6.00
12/01/97	18:00	6.55	12/02/97	17:00	5.89
12/01/97	19:00	6.51	12/02/97	18:00	5.87
12/01/97	20:00	5.98	12/02/97	19:00	5.91
12/01/97	21:00	5.97	12/02/97	20:00	5.68
12/01/97	22:00	6.21	12/02/97	21:00	5.66
12/01/97	23:00	5.79	12/02/97	22:00	5.73
12/02/97	00:00	5.62	12/02/97	23:00	5.60
12/02/97	01:00	5.67			
12/02/97	02:00	5.70	12/03/97	00:00	5.72
12/02/97	03:00	5.38	12/03/97	01:00	5.41
12/02/97	04:00	5.48	12/03/97	02:00	5.38
12/02/97	05:00	5.72	12/03/97	03:00	5.42
12/02/97	06:00	6.08	12/03/97	04:00	5.22
12/02/97	07:00	6.21	12/03/97	05:00	5.17
12/02/97	08:00	6.22	12/03/97	06:00	5.43
12/02/97	09:00	6.20	12/03/97	07:00	5.35
12/02/97	10:00	6.27	12/03/97	08:00	5.43
12/02/97	11:00	6.31	12/03/97	08:00	5.43
12/02/97	12:00	6.30	12/03/97	09:00	5.56

On December 1, the opacity average began to approach the 5% limit. It was observed that the opacity may be slightly higher when the #10 compartment was cleaning. This

OPACITY: (Continued)

compartment was inspected and cleaned on the December 1 with nothing unusual found. On December 2, five of the remaining ten compartments were inspected and cleaned with only minor problems detected and corrected. On December 3, it was decided to do a complete change out of all bags in the compartment showing the most wear (#8). This decision was made even though there was nothing apparently wrong in the compartment. This task was completed between December 3 and 5.

During the period of December 1 - 3, many observations of the stack were made by the three employees certified in plume evaluation. Nothing was observed over the 5% limit. Also during this time, the I/E specialist tasked with the analyzer maintenance had made numerous routine checks of the opacity monitor while it was still in place. On December 3, the transmissometer was pulled off the stack for bench testing. It was found that the lens was clouded from no apparent cause. This created an approximate 2-3% offset in the measured opacity. The kiln was in full operation for this time up to 1:35 a.m. on 12/02. At this time it was shut down for a period of two hours during which our monitor continued to read opacity over 5.0%. A flame was put back in the kiln at 3:35 for preheating, and feed was re-introduced at 5:55 a.m. We were in startup for the rest of the period above.

It is Ash Grove's opinion that there was no violation of the 5% opacity limit as the opacity monitor was reading approximately 2-3% high. Even as such, Ash Grove should be exempt from penalty under WAC 173-400-107 subsection 6. As demonstrated above, the event was not caused by poor operation, maintenance or design. The event is not recurring, and the operator took immediate and appropriate action.

<u>Date</u>	<u>Time</u>	<u>Hourly Value</u>	<u>Date</u>	<u>Time</u>	<u>Hourly Value</u>
12/04/97	03:00	5.86	12/04/97	06:00	8.60
12/04/97	04:00	5.87	12/04/97	07:00	5.45
12/04/97	05:00	9.08			

During this period of time, the kiln was in full operation, with the main baghouse operating normally, with the exceptions described below. One of the main kiln baghouse compartments had been isolated for maintenance during the previous day. It was left isolated overnight as the work was not complete and was to be continued the following day. As it happened, the isolation valve had stuck partially open. This caused a reduced cleaning of the rest of the baghouse, and eventually, the bags loaded up. At 4:15 a.m., the kiln production was reduced by 20% from 160 TPH to 130 TPH to allow the baghouse to clean. At 7:00 a.m., the valve was fixed and the kiln operation and opacity returned to normal. This exceedence of our opacity limit was caused by a mechanical failure, not caused by poor maintenance or operation. It was handled in a timely fashion, and is not of

a recurring nature. It should therefore be excused from penalty under WAC 173-400-107 subsection 6.

KILN START-UP / SHUTDOWN LOG

<u>Date</u>	<u>Time</u>	<u>Event</u>
12/02/97	01:35	Kiln shut down due to mechanical problems with Discharge pan conveyor.
12/02/97	03:35	Flame put back on kiln. (Start-up begins)
12/02/97	05:55	Feed put back on kiln. (Start-up begins)
12/03/97	05:55	Kiln start-up over.
12/03/97	13:20	Kiln shut down due to mechanical problems with discharge clinker breaker.
12/03/97	13:30	Flame put back on kiln. (Start-up begins)
12/03/97	13:35	Feed put back on kiln. (Start-up begins)
12/04/97	13:35	Kiln start-up over.
12/07/97	13:50	Kiln shut down repair refractory.
12/13/97	02:25	Flame put back in kiln. (Preheat begins)
12/14/97	02:45	Feed put back on kiln. (Start-up begins)
12/15/97	02:45	Kiln start-up over.
12/16/97	09:40	Kiln shut down due to mechanical problems with Discharge pan conveyor.
12/16/97	12:15	Flame put back on kiln. (Start-up begins)
12/16/97	13:30	Feed put back on kiln. (Start-up begins)
12/17/97	13:30	Kiln start-up over.
12/22/97	10:10	Kiln shut down due to patch a cooler tube shell.
12/22/97	10:50	Flame put back on kiln. (Start-up begins)
12/22/97	11:20	Feed put back on kiln. (Start-up begins)
12/23/97	11:20	Kiln start-up over.

MONITOR DOWNTIME REPORT:

<u>Date</u>	<u>Time Down</u>	<u>Time Up</u>	<u>Reason Down</u>
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The monitor and Data Acquisition System maintained a 90% daily operational time throughout the month

110 Union Street, Suite 500, Seattle, Washington 98101-2038
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339

Mail No. 2116155729

PNB. 36586

NOTICE OF VIOLATION

Date of Violation: November 4, 19 97 at _____ .m.

Name Ash Grove Cement Co.		Responsible Person, Title Henrik Voldbaek Plant Manager	
Location of Violation (Address) 3801 E. Marginal Way So.	City Seattle	Zip 98134	County King
Mailing Address As Above	City, State Seattle, WA.	Zip 98134	Phone 206 623-5596

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. _____, Condition No. _____
- ☒ Section 12.02(a)(1) Unlawful to allow the operation of the cement kiln without the continuous monitoring of emissions for opacity in accordance with 12.03 and 12.04
- ☐ Section 12.02(c) Unlawful to allow the operation of the cement kiln which is required to use a CEM through order of approval 5730 #8 without the continuous monitoring of emissions in accordance w/ Reg. I 12.03 and 12.04.

FACTS ALLEGED TO CONSTITUTE A VIOLATION

November CEM Report. Failure to monitor NOx, CO and SO₂

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

RECEIVED

FEB 07 1998

AGCW SEATTLE

Issued By: [Signature]
Air Pollution Inspector
Form No. 70-119 (Revised 12/95 cbc)

2/4/98
Date/Time [Signature]

Received By: _____
Signing this Notice is not an admission of guilt

AGCS2M000037

ASH GROVE CEMENT COMPANY



"WESTERN REGION"

June 30, 1997

Neal J. Shulman
Puget Sound Air Pollution Control Agency
110 Union Street, Suite 500
Seattle WA 98101-2038

Dear Mr. Shulman:

Re: Notice of Violation 37387 - 37395

In each of the three events in the analyzer was taken out of service for unavoidable maintenance. Two were to correct problems detected with the SO₂ analyzer and one was for the NO_x analyzer. All of the gas monitors are on the same extractive system and for much of the maintenance, it is necessary to remove all three analyzers from service to work on a single analyzer. The analyzers are on a routine maintenance schedule. This maintenance schedule is designed to correct problems at the earliest time possible. The maintenance performed on the NO_x and SO₂ analyzers was necessary and couldn't have been done in a shorter time frame.

These incidences did not violate any PSAPCA rule. Regulation I section 12.03(h) specifies how much monitor down time invalidates the data, but Regulation I does not currently impose any minimum data recovery requirement for CEM operators. The draft article 12 amendments currently under development by PSAPCA would impose such a requirement. Even under the draft rule, down time due to CEM maintenance would not be a violation.

Sincerely,

J. Trygve Grey
Process Engineer

ASH GROVE CEMENT COMPANY



"WESTERN REGION"

August 19, 1997

Ms. Elizabeth Gilpin
Puget Sound Air Pollution Control Agency
110 Union Street, Suite 500 Seattle, WA. 98101-2038

Re: Notices of Violation No. 37399 - 37407; 37067 - 37069

Dear Ms. Gilpin:

In each of the three May occurrences, the analyzer were taken out of service for maintenance. On May 5, 1997, schedule maintenance was conducted to clean filters and calibrate the instruments. On May 12, 1997 and May 21, 1997, unscheduled maintenance was needed to repair communication links and data acquisition problems associated to a power outage event on May 7.

On June 25, 1997, the SO2 analyzer was taken off line for scheduled maintenance. As is necessary for much of the maintenance, all three analyzers had to be removed from service since they share the same extractive system.

These incidences did not violate any PSAPCA rule, Regulation I section 12.03 (h) specifies how much monitor down time invalidates the data, but Regulation I does not currently impose any minimum data recovery requirement for CEM operators. The draft article 12 amendments currently under development by PSAPCA would impose such a requirement. Even under the draft rule, down time due to CEM maintenance would not be a violation.

The written Quality Control Plan program is under revision and will be submitted upon completion.

Please let me know if you have any further question.

Yours truly,

Gerald J. Brown
Manager Safety and Environment

Copy: Henrik Voldbaek

PSAPCA ACTION		DATES	PENALTY (PROPOSED)	REASON (STATUS)
NOV# 37431	Issue: Rec:	09/16/97 09/18/97	Not. Est.	July 30, 1997 CEM Report - Missing NOx monitoring data.
NOV# 37430	Issue: Rec:	09/16/97 09/18/97	Not. Est.	July 30, 1997 CEM Report - Missing CO monitoring data.
NOV# 37429	Issue: Rec:	09/16/97 09/18/97	Not. Est.	July 30, 1997 CEM Report - Missing SO2 monitoring data.
NOV# 37428	Issue: Rec:	09/16/97 09/18/97	Not. Est.	July 28, 1997 CEM Report - Missing NOx monitoring data.
NOV# 37427	Issue: Rec:	09/16/97 09/18/97	Not. Est.	July 28, 1997 CEM Report - Missing CO monitoring data.
NOV# 37426	Issue: Rec:	09/16/97 09/18/97	Not. Est.	July 28, 1997 CEM Report - Missing SO2 monitoring data.
NOV# 37425	Issue: Rec:	09/16/97 09/18/97	Not. Est.	July 25, 1997 CEM Report - Missing NOx monitoring data.
NOV# 37424	Issue: Rec:	09/16/97 09/18/97	Not. Est.	July 25, 1997 CEM Report - Missing CO monitoring data.
NOV# 37423	Issue: Rec:	09/16/97 09/18/97	Not. Est.	July 25, 1997 CEM Report - Missing SO2 monitoring data.
NOV# 37422	Issue: Rec:	09/16/97 09/18/97	Not. Est.	July 23, 1997 CEM Report - Missing NOx monitoring data.
NOV# 37421	Issue: Rec:	09/16/97 09/18/97	Not. Est.	July 23, 1997 CEM Report - Missing CO monitoring data.
NOV# 37420	Issue: Rec:	09/16/97 09/18/97	Not. Est.	July 23, 1997 CEM Report - Missing SO2 monitoring data.
NOV# 37419	Issue: Rec:	09/16/97 09/18/97	Not. Est.	July 22, 1997 CEM Report - Missing NOx monitoring data.
NOV# 37418	Issue: Rec:	09/16/97 09/18/97	Not. Est.	July 22, 1997 CEM Report - Missing CO monitoring data.
NOV# 37417	Issue: Rec:	09/16/97 09/18/97	Not. Est.	July 22, 1997 CEM Report - Missing SO2 monitoring data.
NOV# 37416	Issue: Rec:	09/16/97 09/18/97	Not. Est.	July 21, 1997 CEM Report - Missing NOx monitoring data.
NOV# 37415	Issue: Rec:	09/16/97 09/18/97	Not. Est.	July 21, 1997 CEM Report - Missing CO monitoring data.
NOV# 37414	Issue: Rec:	09/16/97 09/18/97	Not. Est.	July 21, 1997 CEM Report - Missing SO2 monitoring data.
NOV# 37413	Issue: Rec:	09/16/97 09/18/97	Not. Est.	July 15, 1997 CEM Report - Missing NOx monitoring data.

NOV# 37412	Issue: Rec:	09/16/97 09/18/97	Not. Est.	July 15, 1997 CEM Report - Missing CO monitoring data.
NOV# 37411	Issue: Rec:	09/16/97 09/18/97	Not. Est.	July 15, 1997 CEM Report - Missing SO2 monitoring data.
NOV# 37410	Issue: Rec:	09/16/97 09/18/97	Not. Est.	July 14, 1997 CEM Report - Missing NOx monitoring data.
NOV# 37409	Issue: Rec:	09/16/97 09/18/97	Not. Est.	July 14, 1997 CEM Report - Missing CO monitoring data.
NOV# 37408	Issue: Rec:	09/16/97 09/18/97	Not. Est.	July 14, 1997 CEM Report - Missing SO2 monitoring data.
NOV# 37069	Issue: Rec:	08/05/97 08/07/97	Not. Est.	June 25, 1997 CEM Report - Missing CO monitoring data.
NOV# 37068	Issue: Rec:	08/05/97 08/07/97	Not. Est.	June 25, 1997 CEM Report - Missing NOx monitoring data.
NOV# 37067	Issue: Rec:	08/05/97 08/07/97	Not. Est.	June 25, 1997 CEM Report - Missing SO2 monitoring data.
NOV# 37407	Issue: Rec:	08/05/97 08/07/97	Not. Est.	May 21, 1997 CEM Report - Missing NOx monitoring data.
NOV# 37406	Issue: Rec:	08/05/97 08/07/97	Not. Est.	May 21, 1997 CEM Report - Missing CO monitoring data.
NOV# 37405	Issue: Rec:	08/05/97 08/07/97	Not. Est.	May 21, 1997 CEM Report - Missing SO2 monitoring data.
NOV# 37404	Issue: Rec:	08/05/97 08/07/97	Not. Est.	May 12, 1997 CEM Report - Missing NOx monitoring data.
NOV#37403	Issue: Rec:	08/05/97 08/07/97	Not. Est.	May 12, 1997 CEM Report - Missing CO monitoring data.
NOV# 37402	Issue: Rec:	08/05/97 08/07/97	Not. Est.	May 12, 1997 CEM Report - Missing SO2 monitoring data.
NOV# 37401	Issue: Rec:	08/05/97 08/07/97	Not. Est.	May 5, 1997 CEM Report - Missing NOx monitoring data.
NOV# 39400	Issue: Rec:	08/05/97 08/07/97	Not. Est.	May 5, 1997 CEM Report - Missing CO monitoring data.
NOV# 37399	Issue: Rec:	08/05/97 08/07/97	Not. Est.	May 5, 1997 CEM Report - Missing SO2 monitoring data.
NOV# 36232	Issue: Rec:	06/05/97 06/06/97	Not. est.	April 19 1997 CEM Report - Missing NOx monitoring data.
NOV# 37387	Issue: Rec:	06/05/97 06/06/97	Not. Est.	April 8, 1997 CEM Report - Missing SO2 monitoring data.
NOV# 37388	Issue: Rec:	06/05/97 06/06/97	Not. Est.	April 25, 1997 CEM Report - Missing SO2 monitoring data.
NOV# 37389	Issue: Rec:	06/05/97 06/06/97	Not. est.	April 30, 1997 CEM Report - Missing SO2 monitoring data.

NOV# 37390	Issue: Rec:	06/05/97 06/06/97	Not. est.	April 8, 1997 CEM Report - Missing NOx monitoring data.
NOV# 37391	Issue: Rec:	06/05/97 06/06/97	Not. est.	April 25, 1997 CEM Report - Missing NOx monitoring data.
NOV# 37392	Issue: Rec:	06/05/97 06/06/97	Not. est.	April 30, 1997 CEM Report - Missing NOx monitoring data.
NOV# 37393	Issue: Rec:	06/05/97 06/06/97	Not. est.	April 8, 1997 CEM Report - Missing CO monitoring data.
NOV# 37394	Issue: Rec:	06/05/97 06/06/97	Not. est.	April 25, 1997 CEM Report - Missing CO monitoring data
NOV# 37395	Issue: Rec:	06/05/97 06/06/97	Not. est.	April 30, 1997 CEM Report - Missing CO monitoring data

KILN START-UP / SHUTDOWN LOG (cont.)

<u>Date</u>	<u>Time</u>	<u>Event</u>
07/30/97	19:40	Kiln shut down due to a power outage.
07/30/97	21:45	Flame put back in kiln. (Preheat begins)
07/30/97	22:40	Feed put back on kiln. (Start-up begins)
07/31/97	09:30	Kiln shut down to repair hole in satellite cooler.
07/31/97	11:20	Flame put back in kiln. (Preheat begins)
07/31/97	11:40	Feed put back on kiln. (Start-up begins)
08/01/97	11:40	Kiln start-up over.

MONITOR DOWNTIME REPORT:

Quite a lot of maintenance was performed on all the analyzers this month. As a result, the monitor was out of service longer than is normal. This was for maintenance that is performed on an annual basis. This is necessary to ensure proper operation with minimal maintenance throughout the rest of the year.

<u>Date</u>	<u>Time Down</u>	<u>Time Up</u>	<u>Reason Down</u>
07/14/97	08:00	14:45	Work on the O2 sensor: Replaced the cell and mirror,
07/15/97	07:45	14:00	clean the system, re-align the sensor.
07/21/97	07:30	15:00	Replace the flow sensor on the O2 monitor. Realign the
07/22/97	08:15	15:00	O2 sensor. Clean and align the Nox Monitor. Recharge
07/23/97	08:15	13:45	the charcoal. Rebuild the sample pump. Clean the
07/24/97	07:30	14:15	refrigeration system. Replace the water traps. Clean all
			sample lines, filters, and valves.
07/28/97	08:15	14:00	Replace sample cell and two photo multiplier tubes on the
			RADAS II SO2 monitor
07/30/97	07:15	13:00	Readjust the symmetry on the RADAS II photo multiplier
			tubes. This was done as a follow up of the work on 7/28.

Registration No **R 11339**

206-348-8800 • 1-800-522-3565 \ Fax 206-343-7522

Cert. Mail No.: **Z334353616**

NOTICE OF VIOLATION

Date of Violation: July 14, 1997 at: m.

Name: Ash Grove Cement Corp.	Responsible Person, Title: Henrik Voldbaek, Manager		
Location of Violation (Address): 3801 East Marginal Way S	City: Seattle	Zip: 98134	County: King
Mailing Address: 3801 East Marginal Way S	City, State: Seattle, WA	Zip: 98134	Phone: (206) 623-5596

**DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:
REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:**

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. . Condition No.
- ☒ Section **12.02(c) Operation of the cement kiln without continuous monitoring of emissions in accordance with**

Regulation I 12.03 and 12.04.

- ☒ Section **12.03(h)(4) Less than 90% valid hours CEM data while source is in operation.**

FACTS ALLEGED TO CONSTITUTE A VIOLATION July CEM Report missing SO2 monitoring data.

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Submit written Quality Control Program procedures as required by Regulation I Section 12.03(e).

Issued By *Frank L. Hunter* Date/Time 9/14/97 Received By _____
am

KILN START-UP / SHUTDOWN LOG

<u>Date</u>	<u>Time</u>	<u>Event</u>
06/10/97	09:15	Kiln shut down to clean buildup off the kiln draft fan.
06/10/97	10:30	Flame put back in kiln. (Preheat begins)
06/10/97	11:30	Feed put back on kiln. (Start-up begins)
06/11/97	11:30	Kiln start-up over.
06/21/97	10:12	Kiln shut down due to a material plug in the preheater tower..
06/21/97	22:15	Flame put back in kiln. (Preheat begins)
06/22/97	03:30	Feed put back on kiln. (Start-up begins)
06/23/97	03:30	Kiln start-up over.
06/26/97	10:30	Kiln shut down to patch a hole in the planetary coolers.
06/26/97	10:50	Flame put back in kiln. (Preheat begins)
06/26/97	10:50	Feed put back on kiln. (Start-up begins)
06/27/97	10:50	Kiln start-up over.

MONITOR DOWNTIME REPORT:

<u>Date</u>	<u>Time</u> <u>Down</u>	<u>Time</u> <u>Up</u>	<u>Reason Down</u>
06/25/97	10:15	15:00	Cleaned sample cell for the RADAS II and re-aligned the analyzer.

110 Union Street, Suite 500, Seattle, Washington 98101-2038
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339
Cert. Mail No. 2384353605

No. **37067**

NOTICE OF VIOLATION

Date of Violation: 6-25 19 97 at _____ m.

Name <u>Ash Grove Cement Co.</u>		Responsible Person, Title <u>Henrik Voldbaek, Mgr</u>	
Location of Violation (Address) <u>3801 E. Marginal Wy S</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>KING</u>
Mailing Address <u>Same</u>	City, State <u>, WA</u>	Zip <u></u>	Phone <u>623-5596</u>

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. _____, Condition No. _____

☒ Section 12.02(c) Operation of cement kiln without continuous monitoring of emissions in accordance with Reg I Section 12.03 + 12.04

☒ Section 12.03(h)(4) Less than 90% valid hours of CEM data while source is in operation

FACTS ALLEGED TO CONSTITUTE A VIOLATION June 1997 CEM report - missing SO₂ data

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Submit written QC program as required by Reg I Section 12.03(e)

And S. Christen

Issued By: M. McKel
Air Pollution Inspector
Form No. 70-119 (Revised 12/95 cbc)

8/5/97
Date/Time

Received By: _____
Signing this Notice is not an admission of guilt

KILN START-UP / SHUTDOWN LOG (cont.)

<u>Date</u>	<u>Time</u>	<u>Event</u>
05/23/97	02:05	Kiln shut down on power outage.
05/23/97	02:55	Flame put back in kiln. (Preheat begins)
05/23/97	03:05	Feed put back on kiln. (Start-up begins)
05/23/97	09:40	Kiln shut down on power outage.
05/23/97	10:00	Flame put back in kiln. (Preheat begins)
05/23/97	10:00	Feed put back on kiln. (Start-up begins)
05/24/97	10:00	Kiln start-up over.
05/29/97	13:08	Kiln shut down on power outage.
05/29/97	13:40	Flame put back in kiln. (Preheat begins)
05/29/97	13:50	Feed put back on kiln. (Start-up begins)
05/30/97	14:25	Kiln start-up over.

MONITOR DOWNTIME REPORT:

<u>Date</u>	<u>Time Down</u>	<u>Time Up</u>	<u>Reason Down</u>
05/05/97	09:00	14:15	The CEM was off line for maintenance in preparation for running the CGA. The filters were cleaned and calibration performed.
05/12/97	08:15	16:15	The CEM was taken off line as it was attempted to restore communication to the DAS. A power outage on 5/7 had interrupted the communication. Communication was finally restored on 5/20. In the meantime, the data was collected by HP 1000 computers used for collecting our process data.
05/21/97	08:45	11:30	The DAS was taken offline to restore the automatic archiving. This was not working properly after communication had been restored between the DAS and CEM.

KILN START-UP / SHUTDOWN LOG

<u>Date</u>	<u>Time</u>	<u>Event</u>
03/31/97	13:17	Feed put back on kiln.
04/01/97	13:17	Kiln start-up over.
04/02/97	03:30	Kiln shut down to repair main burner.
03/04/97	12:00	Flame put back in kiln.
04/02/97	23:50	Feed put back on kiln.
04/03/97	12:00	Kiln start-up over.
04/24/97	09:25	Kiln shut down to repair holes in the satellite coolers.
04/24/97	15:15	Flame put back in kiln.
04/24/97	11:30	Feed put back on kiln.
04/25/97	11:30	Kiln start-up over.

MONITOR DOWNTIME REPORT:

<u>Date</u>	<u>Time Down</u>	<u>Time Up</u>	<u>Reason Down</u>
04/08/97	07:15	11:00	The SO ₂ Analyzer had been unstable. The sample cell was cleaned and the catalyst changed and the analyzer was recalibrated.
04/25/97	07:45 11:30	08:30 13:00	There was low pressure to the NO _x analyzer. The sample pump was rebuilt and replaced.
04/30/97	7:30	14:45	The SO ₂ analyzer failed calibration. The UV lamp was replaced. This has been an ongoing problem. Applied Automation has developed a new UV lamp which we should be receiving this month.

110 Union Street, Suite 500, Seattle, Washington 98101-2038
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339

Cert. Mail No. Z 334353-01

No. 36232

NOTICE OF VIOLATION

Date of Violation: 4-19

19 97

at _____ m.

Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>Henrik Voldbaek, Mgr</u>		
Location of Violation (Address) <u>3801 E. Marginal Wy S</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>KING</u>
Mailing Address <u>Same</u>	City, State <u>, WA</u>	Zip	Phone <u>623-5596</u>

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION _____ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☒ Failure to meet Order of Approval No. 5730, Condition No. 6B NOx emissions > 700ppm
- ☐ Section at 10% oxygen, 1 hr average
- ☐ Section _____

FACTS ALLEGED TO CONSTITUTE A VIOLATION April 1997 CEM Report

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Issued By: M. McCaffrey

Air Pollution Inspector

Date/Time 6/5/97

Received By: _____

Signing this Notice is not an admission of guilt